

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 14, 2017

GI-2016-08-SDG46-07
GI-2016-08-SEM40-07

Mr. Jimmie Cho, Senior Vice President
Gas Operations and System Integrity
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

Subject: General Order (G.O.) 112-F¹ Inspection of Sempra Energy Utility's Operator Qualification Program

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F¹ Inspection of Sempra Energy Utility's Operator Qualification Program Unit on August 22 through September 1, 2016. This inspection unit includes the Southern California Gas Company's (SCG) and San Diego Gas and Electric Company's (SDG&E) operator qualification programs. The inspection included a review of the Inspection Unit's OQ program records for calendar years 2013 through 2015 and observed Sempra Energy Utility's employees performing covered tasks on pipeline facility at "Situation City" training facility in Pico Rivera, CA and at "Skill City" training facility in Mission Valley, CA. SED staff also conducted field observation of randomly selected individuals performing covered tasks.

SED staff made five recommendations. The recommendations are noted in the attached "Summary of Inspection Findings".

Please provide a written response within 30 days of your receipt of this letter indicating the measures taken by SCG to address the recommendations noted in the Summary of Inspection Findings.

If you have any questions, please contact Mahmoud (Steve) Intably, at (213) 576-7016.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

CC: Mahmoud (Steve) Intably, SED/GSRB, Matthewson Epuna, SED/GSRB, Kan Wai Tong, SED/GSRB, and Troy Bauer, Sempra Energy Utilities

¹ General Order 112-F was adopted by the Commission on June 25, 2015 via 15-06-044

Summary of Inspection Findings
2016 Sempra Energy Utility – Operator Qualification Program Inspection Unit
(Southern California Gas Company and San Diego Gas and Electric Company)
August 26 through September 1, 2016

I. SED Identified Probable Violation

None

II. Concerns and Recommendations

1. SCG’s Gas Standard 167.0100 Operator Qualification Program and SDG&E’s Gas Standard G8113 Operator Qualification Program, Appendix A “Covered Task List for Company Employees” addresses all the operation and maintenance activities that meets the “four part test” in §192.801(b). The OQ program is designed to ensure that all individuals working on Sempra Energy Utility’s DOT-regulated pipeline facilities are OQ-qualified to perform specific covered tasks listed in Appendix A. Some of the covered tasks are complex in nature and describes broad area of expertise. SED recommends that Sempra Energy Utility should review industry practices to evaluate its Covered Tasks List and see if it is more beneficial to break up a covered task into sub-task groups or a create a separate new covered task in order to effectively assign evaluation requirements.
2. SCG’s Gas Standard 167.0100 and SDG&E’s Gas Standard G8113, Appendix B, “Abnormal Operating Conditions” (AOCs), contain examples of generic AOCs that employees must be able to recognize and react. Some of the covered tasks listed in Sempra energy Utility Operation Qualification program only identified generic abnormal operating conditions (AOCs) but did not include provisions that identified task-specific AOCs for a specific covered task. FAQ 4.3 requires operators to identify both task-specific and generic AOCs. SED recommends that Sempra Energy Utility review and revise its procedure to include both task-specific and generic AOCs.
3. SCG’s Gas Procedure 167.0100 Appendix B “Abnormal Operating Conditions” (AOCs) provided examples of abnormal operating conditions that employees must recognize but it does not address the required reactions to the AOCs. SED recommends that Sempra Energy Utility review and revise its procedure to include the required reactions to the AOCs.
4. Sempra Energy Utility should keep appropriate documentation to justify or the basis for the re-qualification frequency/interval for each covered task. The appropriate documentation/ record must reflect the relevant factors including the complexity, criticality, and the frequency of performance of the covered task.
5. SED reviewed Gas Standard 184.09 for the test ID: 22201-02-5.2 and identified deficiencies in the training module. The training module did not sufficiently address the standby process in accordance with the Gas Standard 184.09, Section 6. SED recommends that Sempra Energy Utility incorporate the standby process into the training module. In addition, Sempra Energy Utility should ensure that knowledge tests are consistent with Operation and Maintenance (O&M) procedure or operator practices.

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